

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

RATIO CHRISTI AT THE UNIVERSITY
OF NEBRASKA-LINCOLN, et al.,

Plaintiffs,

v.

TIMOTHY CLARE, et al.

Defendants.

Case No. 4:21-cv-3301

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO ANSWER**

COME NOW all named Defendants and move the Court for an extension of their deadline to answer Plaintiffs' First Amended Complaint from October 21, 2022, to November 4, 2022. In support of this motion, Defendants state as follows:

1. The current answer date is Friday, October 21, 2022.
2. On Thursday, October 20, 2022, counsel for Plaintiffs informed counsel for Defendants of his intent to request leave to file a Second Amended Complaint, subject to approval from Plaintiffs.
3. Defendants do not object to the proposed Second Amended Complaint as represented to them by counsel for Plaintiffs.
4. Counsel for Plaintiffs and Defendants agree that a short extension of the current answer date is appropriate to allow Plaintiffs' counsel to obtain client approval for the Second Amended Complaint, and to avoid the need to respond to the First Amended Complaint which will likely be superseded by a Second Amended Complaint. Counsel for Plaintiffs has represented that an extension of the existing answer date by 14 days should be sufficient for these purposes. If a Second Amended Complaint is filed, Defendants will respond to the Second Amended Complaint in accordance with the deadlines set forth in Fed. R. Civ. P. 15.

WHEREFORE, Defendants respectfully request an order extending their time to answer Plaintiffs' First Amended Complaint to November 4, 2022.

Dated October 20, 2022.

TIMOTHY CLARE, JACK STARK, JIM PILLEN, ELIZABETH O'CONNOR, ROBERT SCHAFER, PAUL KENNEY, BOB PHARES, BARBARA WEITZ, TED CARTER JR., RONNIE GREEN, LAURIE BELLOWS, VERONICA RIEPE, KAREN FREIMUND WILLS, UNIVERSITY PROGRAM COUNSEL, JACOB DRAKE in his official capacity, and KIRSTEN WANDREY in her official capacity, Defendants

By: s/ Andre R. Barry
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was filed with the clerk using the Court's CM/ECF system, which will send notice of the same to all counsel of record.

s/ Andre R. Barry
Andre R. Barry, # 22505